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October 28, 2003

Docket Management Facility
U.S. Department of Transportation
Room PL-401
400 Seventh Street, S.W.
Washington, D.C. 20590

Re: Mandatory Ballast Water Management
Program for U.S. Waters
(USCG-2003-14273)

Dear Sir or Madam:

Crowley Maritime Corporation (Crowley) is a 111 year-old American flag maritime organization. Crowley and its subsidiaries, operate, charter and manage a wide range of vessels and services in both international and domestic trades. The Crowley fleet includes over 200 tugs, barges and deep-sea ships.

We respectfully submit the following comments in response to the Coast Guard's notice of proposed rulemaking (NPRM) entitled "*Mandatory Ballast water Management Program of U.S. Waters*".

Crowley believes that the NPRM is a sound approach to ballast water management for ships equipped with ballast tanks but it is a serious threat to safety of life at sea for domestic tugs and barges. Our experience towing barges has taught us that it is very dangerous to transfer crewmembers between the tug and barge at sea. The concept of including tug and barge units with requirements of oceangoing ships to conduct mid-ocean ballast water exchange should be reconsidered.

We have actively participated in The American Waterways Operators (AWO) ballast water working group and fully support their comments. Our major concerns and recommendations are summarized below:

- The operational characteristics of tug-barge units make it difficult, if not impossible, to comply with the proposed mandatory ballast water management practices.
- The Coast Guard is urged to recognize that the unique characteristics of domestic barge and towing vessel operations may require different approaches to ballast water management than those that apply to oceangoing ships.



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The NPRM ballast water management program is designed for deep-draft vessels on ocean voyages and is not a realistic or safe process for tug and barge units. Crowley supports the Shipping Industry Ballast Water Coalition recommendation that the Coast Guard “explicitly exempt unmanned barges due to the significant safety issues associated with placing crew aboard those vessels to perform ballast water exchange in the harsh mid-ocean environment”.

Crowley appreciates the opportunity to submit these brief comments supporting our maritime trade associations in providing the Coast Guard with positive and constructive comments on this important rulemaking.

Sincerely,

Charles F. Nalen
Vice President
Environmental, Safety and Quality Assurance



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